



Secretary for  
Environmental  
Protection

# California Integrated Waste Management Board

**Margo Reid Brown, Chair**

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Arnold Schwarzenegger  
Governor

April 7, 2006

Pamela Creedon  
Executive Officer  
Central Valley Region  
California Regional Water Quality Control Board  
11020 Sun Center Drive #200  
Rancho Cordova, California 95670-6114

Dear Ms. Creedon:

Thank you for the opportunity to provide early input on the Draft General Waste Discharge Requirements and Monitoring and Reporting Program for Discharges of Green Waste Composting (General WDR) within the Central Valley. The California Integrated Waste Management Board (CIWMB) supports the Regional Water Quality Control Board, Central Region's (Regional Board) stated purpose in adopting the General WDR: to provide an efficient and cost effective means for allowing properly managed Green Waste Operations in the Central Valley Region to continue converting this diverted material into useful compost in a manner that protects water quality.

CIWMB staff has conducted an initial review of the draft General WDR and identified several items that we would like to discuss with you before providing more formal written comments. These items include:

- The need to provide data documenting the scope of this problem addressed by the General WDR, as well as why this proposal differs from the previous Waiver;
- The desirability of using prescriptive design criteria versus performance-based standards;
- The need for cost/benefit analysis of the proposed approach; and
- The need for flexibility to address the climatic diversity of the Central Valley Region

Before the CIWMB submits formal written comments, we would greatly appreciate the opportunity to meet directly with you and your staff sometime in the next few weeks, so that we can discuss our mutual interests and concerns related to this issue. If you are amenable to this, please contact my secretary, Jeannine Harris, at (916) 341-6548 to schedule a meeting date and time.

If you have any questions or concerns regarding this letter please contact me at (916) 341-6544 or Dr. Howard Levenson, the Deputy Director of the CIWMB's Permitting and Enforcement Division, at (916) 341-6311.

Sincerely,

Mark Leary  
Executive Director  
California Integrated Waste Management Board

cc: Members - Regional Water Quality Control Board, Central Region  
Members - California Integrated Waste Management Board  
Wendy Wyels, RWQCB, Central Region, Supervisor, Title 27 and WDR Units

California Environmental Protection Agency

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